

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VIRTAMOVE, CORP.,
Plaintiff,

v.

HEWLETT PACKARD ENTERPRISE
COMPANY,
Defendant.

Case No. 2:24-cv-00093-JRG
(Lead Case)

JURY TRIAL DEMANDED

JOINT MOTION TO DISMISS

Pursuant to Rule 41 (a) of the Federal Rules of Civil Procedure, Plaintiff VirtaMove, Corp. and Defendant Hewlett Packard Enterprise Company (together, the “Parties”) jointly move for dismissal with prejudice of Plaintiff’s claims against Defendant and for dismissal without prejudice of Defendant’s counterclaims against Plaintiff. For the avoidance of doubt, the Parties move only for the dismissal of the above-captioned lead case. The Parties further move this Court to order that all costs and expenses relating to this litigation up to the time of dismissal shall be borne by the party incurring the same.

Dated: July 9, 2025

Respectfully submitted,

By: /s/ Reza Mirzaie

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3) on July 9, 2025.

/s/ Reza Mirzaie
Reza Mirzaie

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that this is a joint motion.

/s/ Reza Mirzaie
Reza Mirzaie